



JANE SWIFT  
Acting Governor

COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Central Regional Office, 627 Main Street, Worcester, MA 01608

3 Ring

BOB DURAND  
Secretary

LAUREN A. LISS  
Commissioner  
APR 12 2001

U.S. Environmental Protection Agency  
JFK Federal Building (HBO)  
Boston, MA 02203

Re: CRWSC - Northbridge  
Covitch Property  
ATF-Davidson  
1 Main Street

Attention: Nancy Smith,  
Site Assessment Manager

RTNs 2-0111, 2-0112  
EPA MAD046128559

Dear Ms. Smith:

This letter is in reference to the Covitch/ATF-Davidson facility located at 1 Main Street, Northbridge, Massachusetts. This site is listed in CERCLIS and has been the subject of the Federal site assessment program. Under the Multi-Site Cooperative Agreement the Department of Environmental Protection ("the Department") reviews the CERCLIS inventory of sites. The Department makes recommendations to the Environmental Protection Agency (EPA) regarding whether the state has sufficient regulatory involvement at the sites to provide for reduced EPA oversight. The EPA and the Department believe this can reduce redundancy by deferring to the state program when appropriate. The program activities include conducting audits and other reviews under the state program and recommending archival of those sites that require no further action under the federal program. It might also involve a request to EPA to defer actions to the state's solid or hazardous waste programs.

The Covitch Property and the ATF-Davidson facility have been listed as a disposal sites under the Massachusetts Contingency Plan (MCP) due to the discovery of polychlorinated biphenyls (PCBs), a petroleum and volatile organic compound plume, chromium, an historical sheen on the Mumford River raceway, foundry sand, coal ash, paint, plating sludge, plating rinsewaters, bromide salt baths, solvents and cutting oils. The EPA completed a Final Site Investigation Report on January 28, 1998 that includes the most recent sampling results, but no new sampling was conducted as a part of the Site Investigation. Response Action Outcome (RAO) statements were submitted per the MCP on both sites (2-0112 submitted on October 31, 1997, 2-0111 December 18, 1998). The Department has not yet evaluated whether they are in compliance with the MCP. An Activity and Use Limitation was filed in conjunction with an RAO submitted for 2-0112. The review has not brought to light any compelling reasons for the EPA to maintain this site on CERCLIS as a site requiring an Expanded Site Investigation. Early in 2000 the

This information is available in alternate format by calling our ADA Coordinator at (617) 574-6872.

DEP on the World Wide Web: <http://www.magnet.state.ma.us/dep>

Printed on Recycled Paper

Department pre-coded this site as a State Lead and it is appropriate to confirm that recommendation at this time. This CERCLIS site will be referred for an audit. The Department would like to reserve the right to request that the EPA maintain the site on CERCLIS if conditions warrant.

Based on the known current site conditions and its regulation under the MCP, the Department recommends that it be designated State Lead by the Environmental Protection Agency. We base this recommendation on the current information in our files. Please contact Greg Root at (508) 792-7653, Ext. 5017 if you have any questions or need further information.

Sincerely,

APR 12 2001



Mark Baldi  
Branch Chief  
Bureau of Waste Site Cleanup

MEB/GLR

Enc. Recommendation memo

Cc: Harish Panchal, DEP, Boston  
Town of Northbridge, Board of Health  
Town of Northbridge, Board of Selectmen  
DEP data entry, EPA recomm.

**MEMORANDUM  
C.R.O.**

**Enforcement Sensitive: Not Public Information**

TO: FILE  
THROUGH: MARK BALDI / AUDIT SECTION  
FROM: GREG ROOT *GR*  
  
DATE: April 9, 2001  
  
SUBJECT: MSCA REVIEW AND RECOMMENDATION  
ATF-DAVIDSON/COVITCH PROPERTY  
1 MAIN STREET  
NORTHBRIDGE, MASSACHUSETTS  
SITE #2-0112, 2-0111  
MAD046128559

The above-referenced location is state-listed under M.G.L. Chapter 21E and 310 CMR 40.0000. It is also listed as a site on the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), which is maintained by the Environmental Protection Agency (EPA). This memo is a review of the findings pursuant to the Multi-Site Cooperative Agreement (MSCA) grant for the purpose of determining if active CERCLIS sites should be given No Further Remedial Action Planned (NFRAP) or State Lead status. This site has not yet been given a NFRAP designation on CERCLIS and the EPA status of the site is State Lead (precode). A Final Site Inspection was completed on January 28, 1998.

Documents on file with the Bureau of Waste Site Cleanup were reviewed for this recommendation.

Site History

The ATF-Davidson (2-0111) and the Covitch Property (2-0112) sites were listed in the Department's Bureau of Waste Site Cleanup database on October 15, 1987 and January 15, 1987, respectively. The Covitch Property was known as Whitin Machine Works for much of its history beginning in 1830 until 1984. The company produced textile machines, but briefly produced engine parts during World War II. This involved foundry casting, finishing and and heat treating. Since the plant's closure, space within the buildings has been rented to various tenants, mostly engaged in light manufacturing. The Covitch property is adjacent to the ATF-Davidson site and the EPA has issued one CERCLIS site number for both properties.

A Class A-3 Response Action Outcome (RAO) Statement and an Activity and Use Limitation (AUL) filed for the "The Shop portion of Covitch Property (Building 9 Raceway Area Only)" on October 31, 1997, and a Class B-1 partial RAO was filed the same day for "The Shop portion of the Covitch Property (AST Area Only)." A Class B-1 RAO was filed for the ATF-Davidson

property on December 18, 1998. The focus of this review was on the RAOs filed for the two sites and also on the SI report dated January 28, 1998.

#### Covitch Property

The Covitch property is adjacent to the ATF-Davidson site and the EPA has issued one CERCLIS site number for both properties. An Activity and Use Limitation was filed in 1997 to prevent usage of the raceway area for any other purpose than industrial or utility work. The 1998 EPA Site Investigation Report prepared for the EPA indicated that a family that included two children were residing in Building 4 on the site. Also, there have been two RAOs filed for the site, one partial and one spatially not restricted. Both RAOs specifically state that they pertain to a certain area, not the whole site. Yet the BWSC database indicates that the whole site has an RAO in effect. This site was referred for a comprehensive audit because it appears that the RAOs refer to specific locations, but may not pertain to the whole site. If that is the case, then the potentially responsible party must take further action to complete a response action outcome that covers the entire site.

There is a potential AUL violation because a provision is that no residential usage shall take place in the Building 9 area, but the family reported to be living on the same parcel in Building 4. It is unclear if there is a barrier to access to the Building 9 raceway area.

Contamination at this location consists of polychlorinated biphenyls (PCBs), a petroleum and volatile organic compound plume, possibly mixed contamination in a coal ash disposal area south of Douglas Road, an historical sheen on the Mumford River raceway. The October 1997 Supplemental Phase I report contained some new data. Volatile Organic Compounds (VOCs), semi-volatile organic compound, total petroleum hydrocarbon (TPH), and metals analyses were conducted on four geoprobe soil samples. Boring logs from the work indicate that PID readings were as high as 1,725 ppm at the water table in boring SB-97-01, and hit the instrument's maximum reading of 2,500 ppm in boring SB-97-06. Strong odors were noted in both borings. TPH levels were as high as 13,000 mg/kg. VOC, metals and TPH analyses were conducted on five groundwater samples from existing monitoring wells. PCB analyses were conducted on soil matrices, where the maximum value was 400 mg/kg. Chromium was present at 1,000 mg/kg in one of two samples from the coal ash disposal area and beryllium was present at a level exceeding Method 1 S-1 Standards (1.0 mg/kg). The LSP concluded that the coal ash area was eligible for an exemption under the MCP.

It is unclear if all potential contamination sources have been located and the nature and extent of contamination defined. Transformer #3 was located outside Building #12, however, file materials do not indicate that any surficial sampling was conducted in the area of that transformer.

The RAO transmittal for the AST area does not indicate what risk characterization method was used to determine No Significant Risk. The RAO transmittal for the Raceway area indicates that Methods 1 & 2 was used to determine No Significant Risk. The AST area is mentioned in the Supplemental Phase I text as being included in the Method 1 & 2 risk characterization. Potential residents on the facility property are not listed as receptors. There is no section of the risk characterization that demonstrates why Method 1 & 2 are applicable to the site. Method 1 may

not be appropriate due to the location of the site next to the Mumford River and the potential for impact. Sediments and surface water were not sampled.

#### ATF-Davidson

On June 19, 1991, the DEP produced a Site Investigation report for the ATF-Davidson site. Potential source areas included: foundry sand in an unlined landfill on the ATF-Davidson site that was reported to include 90% foundry sand, 5% coal ash, 5% paint, plating sludge, plating rinsewaters, bromide salt baths, solvents and cutting oils; sediment in the Mumford River contaminated with electroplating waste (maximum 410 mg/kg chromium). On December 18, 1998, the Department received a Response Action Outcome report and transmittal form from Licensed Site Professional, Neal Drawas. No remedial response actions were conducted to reduce exposure risk at the site. The RAO did not list surface water or sediment as media potentially affected by the releases, nor cited analytical data to support a postulate that the media were not impacted. The RAO did not graphically locate the source areas, nor define the nature and extent of contamination. The RAO did not include exposure point concentrations or derivations of such concentrations. No figure in the RAO defines the boundaries of the foundry sand landfill.

The RAO report indicates that analytical data was compared to Method 1 Risk Characterization Standards, but there is no section of the risk characterization that demonstrates why Method 1 is applicable to the site. A Method 1 risk characterization may not be appropriate due to the location of the site next to the Mumford River and the potential for impact. Sediments and surface water were not sampled. The RAO also does not have any section in which exposure point concentrations are derived, and there is no description of human receptors as defined by the MCP. Environmental populations that may be receptors are not identified. No reasonably foreseeable uses are given.

#### Site Visit

No site visit was performed for this review.

#### Sensitive Receptors

Potential receptors include workers, trespassers, and residents. The facility is partially fenced, so access is not completely prevented. The Mumford River is adjacent to the site. The number of workers on the site is unknown. The nearest residence is approximately 100 feet from the site. No schools or day care facilities are located within 200 feet of the site. There are no other known ecologically sensitive receptors.

#### Compliance Status

RAOs have been submitted for both sites, however, it has yet to be determined if the RAOs apply to the sites in their entirety.

#### EPA Recommendations

The Department recommends that the Covitch Property/ATF-Davidson be given a State Lead status by the EPA. The basis for this determination is information obtained through a file

review. The primary reason for this recommendation because of the questions surrounding the RAOs stated above. The Department cannot, at this time, conclude that the RAOs received are in compliance with the MCP.

DEP Recommendations

These sites are being referred for an audit of the AUL and the RAOs submitted due to potential issues which arose during this review pertaining to whether the RAOs apply to the entire site areas, whether the Response Action Performance Standard was met, whether provisions of the AUL were violated or not properly filed, and whether further work to approach background conditions should have been undertaken.